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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$324,650.00 IN
U.S. CURRENCY,

15 Defendant.
16

2:22-MC-00068-KJM-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Valentina
18 Miles (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 17, 2021, claimant Miles filed a claim in the administrative forfeiture
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$324,650.00 in
21 U.S. Currency (hereafter “defendant currency”), which was seized on August 25, 2021.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person
24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
25 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
2 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
3 That deadline was February 15, 2022.

4 4. By Stipulation and Order filed March 1, 2022, the parties stipulated to extend to May 16,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. By Stipulation and Order filed May 16, 2022, the parties stipulated to extend to August 15,
9 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to
13 September 14, 2022, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
15 to forfeiture.

16 7. Accordingly, the parties agree that the deadline by which the United States shall be required
17 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
18 the defendant currency is subject to forfeiture shall be extended to September 14, 2022.

19 Dated: 8/15/22

PHILLIP A. TALBERT
United States Attorney

21 /s/ Kevin C. Khasigian
22 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

24 Dated: 8/15/22

25 /s/ Mark J. Reichel
MARK J. REICHEL
Attorney for potential claimant
Valentina Miles

26 (As authorized via phone)

IT IS SO ORDERED.

Dated: August 25, 2022.



CHIEF UNITED STATES DISTRICT JUDGE